

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In Re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

**ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY, SECOND AMENDED  
EX PARTE TEMPORARY RESTRAINING ORDER, AND ANTICIPATED  
PRELIMINARY INJUNCTION**

The relief set forth on the following page, numbered two (2), is hereby **ORDERED**.

Page 2

Debtors: LTL Management LLC

Case No.: 23-12825 (MBK)

Caption of Order: **ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY,  
SECOND AMENDED EX PARTE TEMPORARY RESTRAINING ORDER, AND  
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**THIS MATTER** having been opened to the Court by Anthony Hernandez Valadez, by and through his counsel the law firm of Kazan, McClain, Satterley & Greenwood, A Professional Law Corporation (“Kazan Law”), and local counsel Saiber LLC, for the entry of an order granting Movant relief from the Automatic Stay, Second Amended Ex Parte Temporary Restraining Order (“TRO”) and anticipated Preliminary Injunction as to LTL Management, LLC (“Debtor”), non-debtors Johnson & Johnson (“J&J”), Johnson & Johnson Consumer Inc. (“New JJCI”), and retailers Albertsons Companies, Inc., Lucky Stores, Inc., Safeway Inc., Save Mart Supermarkets, Target Corporation, and Walmart Inc. (collectively, “Retailers”) pursuant to Section 362(d)(1) of the Bankruptcy Code, and waiving the fourteen day stay under Federal Rule of Bankruptcy Procedure 4001(a)(3) (the “Motion”), and the Court having considered the moving papers and any papers filed in opposition to the Motion and in reply; and the Court having held a hearing on the Motion on \_\_\_\_\_, 2023; and for good cause shown;

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:**

1. Anthony Hernandez Valadez be and hereby is granted relief from automatic stay, TRO, and anticipated Preliminary Injunction, to fully prosecute his personal-injury lawsuit in the Superior Court of California, County of Alameda (“State Court”). This includes, but is not limited to, allowing Mr. Valadez to proceed to trial immediately against Debtor and non-debtors.
2. The stay set forth in Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure shall not apply to this Order and the Order shall be effective immediately.
3. Mr. Valadez shall serve this order on the Debtor, any trustee and any other party who entered an appearance.